

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Wisconsin  
Civil Division

2020 MAY 22 P 1:46

CLERK OF COURT

D. Bryce Davis

Case No.

20-cv-0780

(to be filled in by the Clerk's Office)

Plaintiff(s)  
(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Facebook.inc. CEO Mark Zuckerberg

Defendant(s)  
(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☐ Yes ☒ No

COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE  
(28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	D. Bryce Davis
Street Address	3338 West Ranch Rd.
City and County	Mequon, Ozaukee County
State and Zip Code	Wisconsin, 53092
Telephone Number	262-202-6454
E-mail Address	feminist.justice@outlook.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Mark Zuckerberg
Job or Title <i>(if known)</i>	CEO of Facebook.inc
Street Address	1601 S. California Ave.
City and County	Palo Alto, Santa Clara County
State and Zip Code	California, 94304
Telephone Number	(650)543-4800
E-mail Address <i>(if known)</i>	www.Facebook.com (Company Website)

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

**A. The Plaintiff(s)**

1. If the plaintiff is an individual

The plaintiff, (name) D. Bryce Davis, is a citizen of the  
State of (name) Mequon, Wisconsin.

2. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**B. The Defendant(s)**

1. If the defendant is an individual

The defendant, (name) Mark Zuckerberg, is a citizen of  
the State of (name) Palo Alto, California. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

2. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under  
the laws of the State of (name) \_\_\_\_\_, and has its  
principal place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

**C. The Amount in Controversy**

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On (date) 03/19/2018, at (place) Help Center at HQ of Facebook (2018), and through email correspondence, the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because *(describe the acts or failures to act and why they were negligent)* ...the defendant is attempting to avoid liability consequences due to the company's continued failure to effectively respond to numerous official complaints citing a potential impersonation violation. Initial reports were submitted in person during March of 2018 at the Headquarters of Facebook located in California. Similar reports were also submitted more recently through email during the early months of 2020, but a resolution was still never reached. Through a series of connections that the Plaintiff has made over the years, the Plaintiff has good reason to believe that he may be being impersonated online by his former USMC peer, named CPL Joseph Dale Priest, on

The acts or omissions caused or contributed to the cause of the plaintiff's injuries by *(explain)* ...causing years of emotional distress, unnecessary loss of wages, emotional harm to children, adversely impacted grades while attempting to earn a second graduate degree, loss of career opportunities, and distressed over the thought of potentially hundreds of individuals have senselessly suffered severe psychological trauma, while others may have seriously considered claiming their own life, (assuming of course), none have tragically committed the act already, for entirely preventable reasons.

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The Plaintiff is modestly requesting for the immediate release of any and all related and unredacted information surrounding a Facebook account that was involved in any and all related Marines United Scandal activity since the inception of the preventable scandal, which can be currently, and or previously identified by any combination of the Plaintiff's legal name (e.g. Darrell Bryce Davis). These documents include, but are not limited to, a complete and unredacted printout of all account(s) history of activity, photos, messaging, contacts, audios, videos, law enforcement/military/government related reports/documents, legal reports/documents and any other related material. This same request is also extended to Facebook's sister company, Instagram as well. The Plaintiff modestly requests for the immediate release of all materials within a week of a favourable decision for the Plaintiff. Although the Plaintiff wishes to impose a permanent self-ban on both Facebook and Instagram platforms forever; however, the Plaintiff wants Facebook to also set up an Online Help Center that provides a permanent email address for both non-users and users to be able to file official complaints that is easily accessible 24/7 to the public, which always provides an automated receipt for every complaint submitted. Lastly, a program/roster should be set up for the public to be able to self-ban themselves, which would enable Facebook and Instagram to both be able to quickly identify any and all duplicate accounts of self-banned/company banned

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 05/03/2020

Signature of Plaintiff



Printed Name of Plaintiff

D. Bryce Davis

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address



## Civil Case Gross Negligence (Attachment)

**Name of Plaintiff:** Darrell Bryce Davis

**Name of Defendant:** Facebook CEO, Mark Zuckerberg

### **Statement of Claim (Full Description):**

...the defendant is attempting to avoid liability consequences due to the company's continued failure to effectively respond to numerous official complaints citing a potential impersonation violation. Initial reports were submitted in person during March of 2018 at the Headquarters of Facebook located in California. Similar reports were also submitted more recently through email during the early months of 2020, but a resolution was still never reached. Through a series of connections that the Plaintiff has made over the years, the Plaintiff has good reason to believe that he may be being impersonated online by his former USMC peer, named CPL Joseph Dale Priest, on one or more social media platforms. While Joe and the Plaintiff previously served together in 3rd Battalion, 1st Marines, Company I (2010-2014); however, the Plaintiff also has good reason to believe that this issue is linked to the *preventable Marines United Scandal*, which grossly resembles the *Police Social Media Scandal* that *The Plainview Project* relatively recently exposed. Due to the nature of this social media scandal as described in public articles online, which involves various forms of cyberbullying, and due also to how many years have senselessly lapsed without a definitive resolution; however, the Plaintiff is deeply concerned that potentially hundreds of individuals may have senselessly suffered severe psychological trauma, while others may have seriously contemplated claiming their own life, (assuming of course), none have tragically committed the act already. As a result, the defendant's repeated failure to adequately address this issue has contributed to loss of wages, emotional distress, severe disruption of Plaintiff's life, loss of career opportunities, the disruption of Plaintiff's children's lives, and potentially disrupting however many additional victims/survivors that have been senselessly negatively impacted over the years. Despite initially inquiring about related concerns with my former *USAF Law Enforcement Military Squadron* (e.g. 720th SFS) and *Cutty Protection Security Services* dating back as early as 2016; however, the Plaintiff has previously filed official complaints to *PD, FBI, CIA, NSA, DOJ, DOD*, multiple Inspector General's, politicians, among numerous other organizations throughout the Government, Law Enforcement and U.S. Intelligence Community. The Plaintiff has also filed numerous Official Whistleblower Complaints with various government agencies, including with the DOD, regarding my genuine concerns as well. Additionally, this preventable matter may be linked to an old, unused, and recently confirmed hacked email address that the Plaintiff once operated years ago (e.g. brycedavis333@yahoo.com), which the Plaintiff initially believed and accidentally reported as a Gmail account (heaven-forbid). Although the Plaintiff has already filed a settlement claim with Yahoo; however, according to public articles online, there are approximately 30,000+ subscribers to this disgusting "private" Facebook page (e.g. Marines United) and one must assume that where there is one person potentially being impersonated online, there are likely others as well. In other words, there could potentially be dozens, hundreds, if not thousands of other service members currently being impersonated without their knowledge. This is why it is absolutely imperative that no one has an immediate knee jerk reaction and automatically assumes that the person(s) operating an online account, automatically matches whatever picture that is being displayed online. Unfortunately, this preventable mess is still time-sensitive, and the Plaintiff fears that a significant amount of permanent damage has already occurred. For more details, feel free to request additional documents submitted to the DOJ OIG, the FBI and other government agencies.

**The Action of Omission...**

...causing years of emotional distress, unnecessary loss of wages, emotional harm to children, adversely impacted grades while attempting to earn a second graduate degree, loss of career opportunities, and distressed over the thought of potentially hundreds of individuals have senselessly suffered severe psychological trauma, while others may have seriously considered claiming their own life, (assuming of course), none have tragically committed the act already, for entirely preventable reasons.

**Relief (Full Description):**

The Plaintiff is modestly requesting for the immediate release of any and all related and unredacted information surrounding a Facebook account that was involved in any and all related Marines United Scandal activity since the inception of the preventable scandal, which can be currently, and or previously identified by any combination of the Plaintiff's legal name (e.g. Darrell Bryce Davis). These documents include, but are not limited to, a complete and unredacted printout of all account(s) history of activity, photos, messaging, contacts, audios, videos, law enforcement/military/government related reports/documents, legal reports/documents and any other related material. This same request is also extended to Facebook's sister company, Instagram as well. The Plaintiff modestly requests for the immediate release of all materials within a week of a favourable decision for the Plaintiff. Although the Plaintiff wishes to impose a permanent self-ban on both Facebook and Instagram platforms forever; however, the Plaintiff wants Facebook to also set up an *Online Help Center* that provides a permanent email address for both non-users and users to be able to file official complaints that is easily accessible 24/7 to the public, which always provides an automated receipt for every complaint submitted. Lastly, a program/roster should be set up for the public to be able to self-ban themselves, which would enable Facebook and Instagram to both be able to quickly identify any and all duplicate accounts of self-banned/company banned users, in order to help prevent potential impersonation attempts from ever re/occurring without a person's knowledge. A similar feature should be created for current users as well, in order to prevent duplicate accounts from appearing and causing harm to not only to the individual being impersonated, but also to other users as well. This effort is merely to help make Facebook and Instagram platforms safer for both non-users and users, which will also hopefully lead to the prevention of duplicate accounts from potentially sprouting up without a person's knowledge.